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8-6-04

AF 1642⁶¹

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

INVENTOR: Dan Kikinis et al.
CASE: P3233D1
SERIAL NO.: 09/387,616 GROUP ART UNIT: 2642
FILED: 08/31/1999 EXAMINER: Knowlin, Thjuan P.
SUBJECT: Method and Apparatus for Providing an Interactive Home
Agent With Access to Call Center Functionality and
Resources

PARTY IN INTEREST: All inventions in the disclosure in the present case are assigned to or assignable to:

Genesys Telecommunications Laboratories, Inc.

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AUG 10 2004

Technology Center 2600

To: The Commissioner of Patents
PO Box 1450
Alexandria, VA 22313-1450

SIR,

APPEAL BRIEF



- 2 -

37 C.F.R 1.192(c)(1) Real Party in Interest

The real party in interest is the party named above in the caption of the brief, Genesys Telecommunications Laboratories, Inc.

37 C.F.R 1.192(c)(2) Related Appeals and Interferences

This is an appeal from the Office Action of the Primary Examiner dated 06/10/04 Finally rejecting claims 1-25, the only pending claims in the application. There are no related appeals or interferences in the instant case.

37 C.F.R 1.192(c)(3) Status of the Claims

Claims 1-25 were submitted with the original patent application USSN 09/387,616 filed on 08/31/99. Arguments were provided over the sole reference of Miloslavsky, in appellant's Amendment A filed 09/26/2002 in response to the first non-Final action in the case mailed 08/28/02 rejecting claims 1-25. Further arguments were provided in appellant's Response B filed 03/11/2003 accompanying a Request for Continued Examination (RCE), in response to the Final Action mailed 01/14/03 maintaining the rejection of claims 1-25 and the reference of Miloslavsky. Further arguments were provided in appellant's Response C filed 09/12/2003 in response to the non-Final Action mailed 04/25/03, rejecting claims 1-25. In this Action the Examiner withdrew the reference of Miloslavsky, and presented the new reference of Sonesh for anticipating the claimed invention. Arguments over Sonesh were provided in appellant's Response D filed 04/05/2004, accompanying a second RCE, in response to the Final Action mailed on 12/03/2003 maintaining the rejection of

claims 1-25 and the reference Sonesh. Therefore claims 1-25 as originally filed are left standing for examination and have been maintained in that form until the present Appeal responsive to the Final Action mailed on 06/10/04 maintaining the rejection of claims 1-25.

37 C.F.R 1.192(c)(4) Status of Amendments

Following is a chronological listing of Office Actions and Amendments filed in the instant case:

1. Case filed with claims 1-25 on 08/31/99, case accorded USSN 09/387,616.
2. First non-Final Action mailed 08/28/02 rejecting claims 1-25 as anticipated by Miloslavsky.
3. Response filed 09/26/2002 as Amendment A, providing arguments over Miloslavsky.
4. Final Action mailed 01/14/03 maintaining the rejection of claims 1-25.
5. Response to Final filed with RCE on 03/11/2003 as Response B providing further arguments over Miloslavsky.
6. Non-Final action mailed on 04/25/03 rejecting claims 1-25 as anticipated by the new reference of Sonesh.
7. Response filed 09/12/2003 as Response C providing arguments over Sonesh.
8. Final Action mailed 12/03/03 maintaining the rejection of claims 1-25.
9. Response to Final filed with second RCE on 04/05/04 as Response C providing still further arguments over Sonesh.
10. Final action mailed 06/10/04 maintaining the rejection of claims 1-25.
11. Notice of Appeal filed on 07/29/2004.

As of the time of this Appeal Brief, claims 1-25 as originally filed stand for decision on appeal from the examiner's Final rejection made on 06/10/04

37 C.F.R 1.192(c)(5) Summary of the Invention

The invention is a system and method for establishing a remote agent station from a call center. The system according to a preferred embodiment of the invention is depicted in Fig. 1 and methods of practicing the invention according to the preferred embodiment are described in enabling detail in the specification, and are exemplified in independent claims 1, 8 and 15.

The system according to the preferred embodiment is exemplified in independent claim 20, which recites a home agent call center system 101, comprising a telephony switch 109 connected to a first trunk adapted for receiving incoming calls from a telephony network, and to a second trunk adapted for placing outbound calls into the network, a computer telephony integration (CTI) processor 111 connected to the telephony switch and to a data base 113, the CTI processor executing a CTI application 108, an agent station 126 remote from the call center, the agent station having a telephone 133 connected by a first telephony line to the telephony network and a computer platform with a video display unit (PC/VDU) 131 connected by a second telephony line through a modem to the telephony network, and a data port associated with the CTI processor adapted to establish a data connection. The data connection is established between the CTI processor and the computer station at the remote agent station, and as incoming calls are switched to the remote agent station, data pertaining to each incoming

call is retrieved from the data base and sent via the open data link to the computer platform at the remote agent station to be displayed on the VDU.

In some embodiments the data connection is established prior to a first call being switched to the remote agent station, and is maintained open thereafter as further calls are switched to the remote agent station. In other embodiments the computer platform at the remote agent station is characterized by a TAPI-compliant device connected to the telephone such that the computer platform may detect incoming telephone calls, and wherein, upon detecting a call from the call center, the computer platform immediately dials up the CTI-processor and establishes the data link by a reduced log-in procedure allowing a minimum time connection. In other embodiments the CTI-processor is characterized by having a modem bank adapted to dial outgoing calls, and wherein, as a call is selected to be switched to the remote agent station, the modem bank dials the remote agent station and establishes the data connection. The telephony network may be a publicly-switched telephony network in some embodiments, and in others, the CTI-processor is adapted as an Internet-connected server, and the data link is established by the computer platform at the agent station dialing up an Internet service provider (ISP) and establishing an Internet link to the CTI-processor.

A method for practicing the invention is provided, as exemplified in independent claim 1, which recites establishing a remote agent station from a call center comprising the steps of establishing a data link between a computer platform at the remote agent station and a CTI processor connected to a telephony switch at the call center, determining to switch a selected one of the incoming calls to an agent at the remote agent station, retrieving data associated with the selected incoming call from a database at the call center, forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the data link, placing a call from the call center to a telephone at

the remote agent station, and switching the selected incoming call to the remote agent station.

In some embodiments the CTI processor at the call center and the computer platform at the remote agent station each have a modem connected by a telephony line to a telephony network, and in the first step (a) of establishing the data link, the link is established by the computer platform dialing up the CTI processor through the telephony network, in other embodiments the telephony network is a publicly-switched telephony network. In other embodiments the CTI processor at the call center is adapted as an Internet server, and in the first step (a) of establishing the data link, the data link is established by the computer platform at the remote agent station dialing up an Internet service provider and establishing an Internet connection to the CTI processor. In still other embodiments, in the fifth step (e) placing a call from a call center to a telephone at the remote agent station, the data forwarded is displayed as a screen pop on a video display connected to the computer platform at the remote agent station. In other alternative embodiments the screen pop may include a script for the agent at the remote agent station, and in still other embodiments first control routines executing at the CTI processor and second control routines executing at the computer platform at the remote agent station are adapted to cooperate over the data link to provide call center services to the agent at the remote agent station.

In another aspect of the present invention, a method is provided for establishing a remote agent station from a call center, and is exemplified in independent claim 8, which recites the steps of implementing a dial-up data link between a computer platform at the remote agent station and a CTI processor connected to a telephony switch at the call center, wherein enabling the data link includes a log-in procedure, and wherein once established, the connection may be renewed after being broken by a reduced log-in procedure, receiving incoming

calls at the call center, determining to switch a selected one of the incoming calls to an agent at the remote agent station, placing a call from the call center to a telephone at the remote agent station via a telephone line connected to the telephone, detecting the incoming call by a TAPI-compliant device connected to the computer platform at the remote agent station and to the telephone line to the telephone at the remote agent station, initiating thereby a dial up of the data link with the reduced log-in procedure, switching the selected incoming call to the remote agent station, retrieving data associated with the selected incoming call from a database at the call center, and forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the open data link.

In some embodiments the CTI processor at the call center and the computer platform at the remote agent station each have a modem connected by a telephony line to a telephony network, and the data link is established by the computer platform dialing up the CTI processor through the telephony network. In other embodiments the telephony network is a publicly switched telephony network. In other embodiments the CTI processor at the call center is adapted as an Internet server, and in the first step (a), the data link is established by the computer platform at the remote agent station dialing up an Internet service provider and establishing an Internet connection to the CTI processor. In still other embodiments, in the eighth step (h), of forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the open data link, the data forwarded is displayed as a screen pop on a video display connected to the computer platform at the remote agent station. In other alternative embodiments the screen pop may include a script for the agent at the remote agent station, and in still other embodiments first control routines executing at the CTI processor and second control routines executing at the

computer platform at the remote agent station are adapted to cooperate over the data link to provide call center services to the agent at the remote agent station.

Another method for practicing the invention is provided as exemplified in independent claim 15, reciting a method for establishing a remote agent station from a call center having a CTI processor connected by CTI link to a telephony switch, comprising steps of receiving incoming calls at the call center, determining to switch a selected one of the incoming calls to an agent at the remote agent station, dialing a modem at a computer platform at the remote agent station by a modem connected to the CTI processor, establishing thereby a data connection between the computer platform at the remote agent station and the CTI processor, placing a call from the call center to a telephone at the remote agent station via a telephone line connected to the telephone, switching the selected incoming call to the remote agent station, retrieving data associated with the selected incoming call from a database at the call center, forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the open data link.

In some embodiments the telephony network is a publicly switched telephony network. In other embodiments the data forwarded in the seventh step (g) is displayed as a screen pop on a video display connected to the computer platform at the remote agent station, and the screen pop may include a script for the agent at the remote agent station. In still other embodiments first control routines executing at the CTI processor and second control routines executing at the computer platform at the remote agent station are adapted to cooperate over the data link to provide call center services to the agent at the remote agent station.

In some embodiments the CTI processor at the call center and the computer platform at the remote agent station each have a modem connected by a

telephony line to a telephony network, and in the first step (a) of establishing the data link, the link is established by the computer platform dialing up the CTI processor through the telephony network, in other embodiments the telephony network is a publicly-switched telephony network. In other embodiments the CTI processor at the call center is adapted as an Internet server, and in the first step (a) of establishing the data link, the data link is established by the computer platform at the remote agent station dialing up an Internet service provider and establishing an Internet connection to the CTI processor. In still other embodiments, in the fifth step (e) placing a call from a call center to a telephone at the remote agent station, the data forwarded is displayed as a screen pop on a video display connected to the computer platform at the remote agent station. In other alternative embodiments the screen pop may include a script for the agent at the remote agent station, and in still other embodiments first control routines executing at the CTI processor and second control routines executing at the computer platform at the remote agent station are adapted to cooperate over the data link to provide call center services to the agent at the remote agent station.

In another aspect of the present invention, a method is provided for establishing a remote agent station from a call center, and is exemplified in independent claim 8, which recites the steps of implementing a dial-up data link between a computer platform at the remote agent station and a CTI processor connected to a telephony switch at the call center, wherein enabling the data link includes a log-in procedure, and wherein once established, the connection may be renewed after being broken by a reduced log-in procedure, receiving incoming calls at the call center, determining to switch a selected one of the incoming calls to an agent at the remote agent station, placing a call from the call center to a telephone at the remote agent station via a telephone line connected to the telephone, detecting the incoming call by a TAPI-compliant device connected to

the computer platform at the remote agent station and to the telephone line to the telephone at the remote agent station, initiating thereby a dial up of the data link with the reduced log-in procedure, switching the selected incoming call to the remote agent station, retrieving data associated with the selected incoming call from a database at the call center, and forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the open data link.

In some embodiments the CTI processor at the call center and the computer platform at the remote agent station each have a modem connected by a telephony line to a telephony network, and the data link is established by the computer platform dialing up the CTI processor through the telephony network. In other embodiments the telephony network is a publicly switched telephony network. In other embodiments the CTI processor at the call center is adapted as an Internet server, and in the first step (a), the data link is established by the computer platform at the remote agent station dialing up an Internet service provider and establishing an Internet connection to the CTI processor. In still other embodiments, in the eighth step (h), of forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the open data link, the data forwarded is displayed as a screen pop on a video display connected to the computer platform at the remote agent station. In other alternative embodiments the screen pop may include a script for the agent at the remote agent station, and in still other embodiments first control routines executing at the CTI processor and second control routines executing at the computer platform at the remote agent station are adapted to cooperate over the data link to provide call center services to the agent at the remote agent station.

Another method for practicing the invention is provided as exemplified in independent claim 15, reciting a method for establishing a remote agent station from a call center having a CTI processor connected by CTI link to a telephony switch, comprising steps of receiving incoming calls at the call center, determining to switch a selected one of the incoming calls to an agent at the remote agent station, dialing a modem at a computer platform at the remote agent station by a modem connected to the CTI processor, establishing thereby a data connection between the computer platform at the remote agent station and the CTI processor, placing a call from the call center to a telephone at the remote agent station via a telephone line connected to the telephone, switching the selected incoming call to the remote agent station, retrieving data associated with the selected incoming call from a database at the call center, forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the open data link.

In some embodiments the telephony network is a publicly switched telephony network. In other embodiments the data forwarded in the seventh step (g) is displayed as a screen pop on a video display connected to the computer platform at the remote agent station, and the screen pop may include a script for the agent at the remote agent station. In still other embodiments first control routines executing at the CTI processor and second control routines executing at the computer platform at the remote agent station are adapted to cooperate over the data link to provide call center services to the agent at the remote agent station.

37 C.F.R 1.192(c)(6) Issues

Whether the Examiner in the present case makes a proper rejection of claims 1-25 as unpatentable over the sole prior art reference of Sonesh. Appellant asserts that Sonesh fails to anticipate the present invention as claimed, because the associated data in Sonesh is simply caller identification derived from the call or input by the caller, and there is no explicit disclosure in Sonesh of automatically retrieving from a database, the associated data and forwarding it along with, or before arrival of the incoming call at the remote agent station. The teaching of Sonesh pertaining to this aspect is vague and inconclusive, and renders Sonesh and invalid reference for a *prima facie* rejection.

37 C.F.R 1.192(c)(7) Grouping of Claims

All of the pending claims stand or fall together, and there is no grouping of separately patentable claims presented herein.

37 C.F.R 1.192(c)(8) Argument

In the last Office Action response dated 06/10/04, the Examiner reasserted the Final 102(e) rejection of claims 1-25, as anticipated by Sonesh. Appellant's prior arguments filed in response to the above Office Action that Sonesh fails to anticipate all of the limitations of the claims in their original form, were not persuasive to the Examiner.

The present invention teaches and claims retrieving and forwarding data associated with the incoming call prior to arrival of the incoming call at the remote station, and the claims specifically recite that the associated data is retrieved from a database at the call center. The associated data in Sonesh is simply caller identification derived from the call or input by the caller, and the associated data may also include a service preference or area of interest also input by the caller. There is no specific teaching in Sonesh of automatically retrieving from a database, the associated data and forwarding it along with, or before arrival of the incoming call at the remote station. The teaching in Sonesh pertaining to this is vague and inconclusive.

The Examiner's Arguments:

Regarding independent claims 1, 8, 15 and 20, and depending claims 22 and 23, the Examiner maintains that Sonesh discloses the claimed system and methods for establishing a remote agent station, stating that Sonesh does teach retrieving data associated with a selected incoming call from a database at the call center and forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the data link.

Appellant has extensively argued that data associated with the incoming call routed to the remote station is not automatically forwarded to the remote station according to the teachings of Sonesh. In response, the Examiner has stated that Sonesh does teach automatically forwarding to the remote station, data associated with the incoming call routed to the remote station and therefore, information required by the remote station is retrieved by the remote station prior to the call being forwarded to the remote station.

Appellant asserts that Sonesh teaches an alternative invention for solving a similar problem to that which is solved by the claimed invention, and the Examiner has applied that rather common practice of rejecting claims because the prior art teaches an alternative invention that might accomplish the same or similar purpose, which does not establish a *prima facie* rejection. In some lengthy and highly technical references, establishing what is taught as a whole can be a difficult task, and still unclear and arguable after treatment by both sides. Not so for the simple reference of Sonesh.

Appellant argues that the reference of Sonesh does not anticipate all of the claimed limitations, and further does not teach all of the method steps in the claims, in the order in which they are recited in the claims, which is required for a *prima facie* rejection. It is appellant's strong opinion that the Examiner in this

case has taken the teachings of Sonesh out of context for reading on appellant's claims. Sonesh teaches a single connection between the remote station and the multimedia call center, not a dual connection for voice and data, as taught in the claimed invention, and Sonesh further fails to specifically teach boarding data associated with a call along with, or before the incoming call, to the remote agent station. The architecture of the connection of Sonesh clearly does not enable the capability.

Appellant wishes to direct the Board's attention to Fig. 1 and associated description in the specification of the claimed invention, wherein a dual connection between the remote agent station 126 and call center 101 is provided, the first connection being a telephone link between the remote agent's telephone and telephony switch 109 of call center 101. A plurality of outgoing call ports are reserved for the home agent connection, one such line 117 is illustrated in Fig. 1 for the telephone link from switch 109 to remote station 126, which is completed from the PSTN via line 127 to the remote agent station. The second of the dual connections is a data link between the home agent's PC and data services at the call center, made via a telephony link 129 from remote station 126 via the PSTN to CTI processor 111 at the call center.

The manner in which the data and call connections are made and used relative to calls switched to remote agents is a key and very important aspect of the claimed invention, and requires the dual connection provided by the invention. In a preferred embodiment of the claimed invention, referring again to Fig. 1, the data connection is kept active by virtue of the dual connection. When a call arrives at telephony switch 109 from a client, and the routing for the call has been determined to be the remote agent, the call is switched to the remote agent station. An outgoing call is subsequently placed to the telephone of the remote agent station, and at the same time, data associated with the call, whether arriving with

the call or accessed from database 113 using information derived from the call, is transmitted to the display unit of the remote agent station, by virtue of the always-open dual data connection. In this manner important client information or a script for the agent may be displayed at the remote agents station at the time of the arrival of the call, or even before the call arrives, allowing the remote agent to better service the call.

Appellant now wishes to redirect the Board's attention to claim 1, wherein in step (c), the claim language specifically recites retrieving data associated with the selected incoming call from a database at the call center, and wherein in step (d), it is specifically recited that the data associated with a selected incoming call is forwarded to the computer platform at the remote agent station via the data link. Appellant points out to the Board that both of the above steps (c) and (d) occur before the actual placing and switching of the incoming call to the remote station.

Further, the reference of Sonesh does not teach retrieving associated data from a database at the call center, as is specifically recited in the language of independent claims 1 and 8. The data retrieved in Sonesh is simply the callers identity determined from the data protocol, address of the data packet, from authentication information carried by a protocol, or possibly data that is manually typed in by the caller. The data may include the caller's selection of service and/or area of interest, which is also manually input by the caller at the time of (not before) the actual placing of the call. The reference of Sonesh, however, fails to disclose anywhere in the specification, that the associated data is retrieved from a database at the call center.

Appellant now redirects the Board's attention to the specification of Sonesh to Fig. 5 and supporting disclosure (col. 10, lines 30-33) wherein it is taught that the distributed call centers 501 and 502 and remote agents 503 have the ability to share databases and other call center administration data. However,

appellant argues that there is no specific teaching that the data shared is data associated with the incoming call, or that it is automatically retrieved and forwarded to the remote station, at the time of, or even before arrival of the incoming call at the remote station. Any data required by the remote station is retrieved by the remote station from the shared databases only after arrival of the incoming call at the remote station. Appellant asserts that the teachings in Sonesh pertaining to retrieving and forwarding data associated with the incoming call are vague and inconclusive, and therefore are improperly read by the Examiner on the specific limitations of appellant's claims.

Appellant therefore believes that independent claim 1 is clearly and unarguably patentable over Sonesh. Appellant's claims 8, 15 and 20 recite methods for establishing a remote agent station from a call center, and a home agent call center system in accordance with claim 1, reciting similar limitations. Appellant believes claims 8, 15 and 20 are then also patentable over the prior art, as argued above on behalf of claim 1. Depending claims 2-7, 9-14, 16-19, and 21-25 are then patentable on their own merits, or at least as depended from a patentable claim.

In conclusion, it is respectfully submitted that the prior art provided by the USPTO in this case essentially fails to anticipate all of the limitations and capabilities as recited in appellant's claim language, and taught in enabling detail in the specification of the present invention. Accordingly, appellant respectfully requests that the Board reverse the final rejection of claims 1-25 and hold them allowable.



37 C.F.R 1.192(c)(9) Appendix

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The following are the claims involved in the Appeal:

1. (Original) A method for establishing a remote agent station from a call center, comprising steps of:
 - (a) establishing a data link between a computer platform at the remote agent station and a CTI processor connected to a telephony switch at the call center;
 - (b) determining to switch a selected one of the incoming calls to an agent at the remote agent station;
 - (c) retrieving data associated with the selected incoming call from a database at the call center;
 - (d) forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the data link;
 - (e) placing a call from the call center to a telephone at the remote agent station; and
 - (f) switching the selected incoming call to the remote agent station.
2. (Original) The method of claim 1 wherein the CTI processor at the call center and the computer platform at the remote agent station each have a modem connected by a telephony line to a telephony network, and in step (a) the data link is established by the computer platform dialing up the CTI processor through the telephony network.
3. (Original) The method of claim 2 wherein the telephony network is a publicly switched telephony network..

4. (Original) The method of claim 1 wherein the CTI processor at the call center is adapted as an Internet server, and in step (a) the data link is established by the computer platform at the remote agent station dialing up an Internet service provider and establishing an Internet connection to the CTI processor.
5. (Original) The method of claim 1 wherein, in step (e), the data forwarded is displayed as a screen pop on a video display connected to the computer platform at the remote agent station.
6. (Original) The method of claim 5 wherein the screen pop includes a script for the agent at the remote agent station.
7. (Original) The method of claim 1 wherein first control routines executing at the CTI processor and second control routines executing at the computer platform at the remote agent station are adapted to cooperate over the data link to provide call center services to the agent at the remote agent station.
8. (Original) A method for establishing a remote agent station from a call center, comprising steps of:
 - (a) implementing a dial-up data link between a computer platform at the remote agent station and a CTI processor connected to a telephony switch at the call center, wherein enabling the data link includes a log-in procedure, and wherein once established, the connection may be renewed after being broken by a reduced log-in procedure;
 - (b) receiving incoming calls at the call center;
 - (c) determining to switch a selected one of the incoming calls to an agent

at the remote agent station;

- (d) placing a call from the call center to a telephone at the remote agent station via a telephone line connected to the telephone;
- (e) detecting the incoming call by a TAPI-compliant device connected to the computer platform at the remote agent station and to the telephone line to the telephone at the remote agent station, initiating thereby a dial up of the data link with the reduced log-in procedure;
- (f) switching the selected incoming call to the remote agent station;
- (g) retrieving data associated with the selected incoming call from a database at the call center; and
- (h) forwarding the data associated with the selected incoming call to the computer platform at the remote agent station via the open data link.

9. (Original) The method of claim 8 wherein the CTI processor at the call center and the computer platform at the remote agent station each have a modem connected by a telephony line to a telephony network, and in step (e) the data link is established by the computer platform dialing up the CTI processor through the telephony network.

10. (Original) The method of claim 9 wherein the telephony network is a publicly-switched telephony network..

11. (Original) The method of claim 8 wherein the CTI processor at the call center is adapted as an Internet server, and in step (a) the data link is established by the computer platform at the remote agent station dialing up an Internet service provider and establishing an Internet connection to the CTI processor.

12. (Original) The method of claim 8 wherein, in step (h), the data forwarded is displayed as a screen pop on a video display connected to the computer platform at the remote agent station.

13. (Original) The method of claim 12 wherein the screen pop includes a script for the agent at the remote agent station.

14. (Original) The method of claim 8 wherein first control routines executing at the CTI processor and second control routines executing at the computer platform at the remote agent station are adapted to cooperate over the data link to provide call center services to the agent at the remote agent station.

15. (Original) A method for establishing a remote agent station from a call center having a CTI processor connected by CTI link to a telephony switch, comprising steps of:

- (a) receiving incoming calls at the call center;
- (b) determining to switch a selected one of the incoming calls to an agent at the remote agent station;
- (c) dialing a modem at a computer platform at the remote agent station by a modem connected to the CTI processor, establishing thereby a data connection between the computer platform at the remote agent station and the CTI processor;
- (d) placing a call from the call center to a telephone at the remote agent station via a telephone line connected to the telephone;
- (e) switching the selected incoming call to the remote agent station;
- (f) retrieving data associated with the selected incoming call from a database at the call center; and
- (g) forwarding the data associated with the selected incoming call to the

computer platform at the remote agent station via the open data link.

16. (Original) The method of claim 15 wherein the telephony network is a publicly-switched telephony network..

17. (Original) The method of claim 15 wherein, in step (g), the data forwarded is displayed as a screen pop on a video display connected to the computer platform at the remote agent station.

18. (Original) The method of claim 17 wherein the screen pop includes a script for the agent at the remote agent station.

19. (Original) The method of claim 15 wherein first control routines executing at the CTI processor and second control routines executing at the computer platform at the remote agent station are adapted to cooperate over the data link to provide call center services to the agent at the remote agent station.

20. (Original) A home agent call center system, comprising:

 a telephony switch connected to a first trunk adapted for receiving incoming calls from a telephony network, and to a second trunk adapted for placing outbound calls into the network;

 a computer telephony integration (CTI) processor connected to the telephony switch and to a data base, the CTI processor executing a CTI application;

 an agent station remote from the call center, the agent station having a telephone connected by a first telephony line to the telephony network and a computer platform with a video display unit (PC/VDU) connected by a second

telephony line through a modem to the telephony network; and

a data port associated with the CTI processor adapted to establish a data connection;

wherein a data connection is established between the CTI processor and the computer station at the remote agent station, and as incoming calls are switched to the remote agent station, data pertaining to each incoming call is retrieved from the data base and sent via the open data link to the computer platform at the remote agent station to be displayed on the VDU.

21. (Original) The system of claim 20 wherein the data connection is established prior to a first call being switched to the remote agent station, and is maintained open thereafter as further calls are switched to the remote agent station.

22. (Original) The system of claim 20 wherein the computer platform at the remote agent station is characterized by a TAPI-compliant device connected to the telephone such that the computer platform may detect incoming telephone calls, and wherein, upon detecting a call from the call center, the computer platform immediately dials up the CTI-processor and establishes the data link by a reduced log-in procedure allowing a minimum time connection.

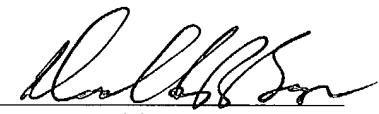
23. (Original) The system of claim 20 wherein the CTI-processor is characterized by having a modem bank adapted to dial outgoing calls, and wherein, as a call is selected to be switched to the remote agent station, the modem bank dials the remote agent station and establishes the data connection.

24. (Original) The system of claim 20 wherein the telephony network is a publicly-switched telephony network.

25. (Original) The system of claim 20 wherein the CTI-processor is adapted as an Internet-connected server, and the data link is established by the computer platform at the agent station dialing up an Internet service provider (ISP) and establishing an Internet link to the CTI-processor.

If any additional time extensions are required beyond any extension petitioned with this Appeal Brief, such extensions are hereby requested. If there are any fees due beyond any fees paid with this Appeal Brief, authorization is given to deduct such fees from deposit account 50-0534.

Respectfully Submitted,
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